

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

DAVITA M. KEY,)	
)	
Plaintiff,)	
)	
v.)	Case No. 2:19-CV-767-ECM
)	
HYUNDAI MOTOR MANUFACTURING,)	
ALABAMA, LLC; HYUNDAI ENG)	
AMERICA, INC.; and DYNAMIC)	
SECURITY, INC.)	
)	
)	
Defendants.)	

EXHIBIT D TO

**PLAINTIFF'S OBJECTIONS TO HYUNDAI MOTOR MANUFACTURING,
ALABAMA, LLC'S DEPOSITION DESIGNATIONS**

CASSANDRA WILLIAMS - ERRATA

Case	Key, Davita
Flags and Notes	

WILLIAMS, CASSANDRA 9/6/22 VOL 1		
1	009:11 - 009:11	009:11 A. I was just called to ask -- to come and
Errata "or" wrong word		
2	017:20 - 017:20	017:20 contract. Yoomi Lea -- I'm sorry -- Yoomi Kim --
Errata Lee		
3	018:07 - 018:07	018:07 as central energy building.
Errata omitted "the"		
4	019:06 - 019:06	019:06 A. I can only speak for security. I have --
Errata insert "no idea"		
5	019:07 - 019:07	019:07 as far as the head count or the --
Errata insert "staffing for the others"		
6	021:03 - 021:03	021:03 A. For securities?
Errata "security's"		
7	022:03 - 022:03	022:03 A. They were --
Errata insert "established"		
8	032:05 - 032:05	032:05 receive it, decide whether or not their
Errata change receive to review		
9	033:02 - 033:02	033:02 A. B.J. McCullough, Neal McMann, Gloria
Errata Neal McMahon		
10	033:04 - 033:19	<p>033:04 Q. Do you know why Ms. Robinson is no longer</p> <p>05 an account manager at HMMA?</p> <p>06 MS. BROWN: Object to form.</p> <p>07 MR. MILLER: Object to form.</p> <p>08 A. She was relocated -- I'm sorry.</p> <p>09 Q. It's okay.</p> <p>10 A. She requested to step down from that</p> <p>11 position.</p> <p>12 Q. What do you know about that?</p> <p>13 A. She told her manager -- and I don't know</p> <p>14 what his position was -- that she wanted to step</p> <p>15 down, and she recommended someone else to take her</p> <p>16 position.</p> <p>17 Q. How did you come to have this knowledge?</p>

		<p>18 A. She told me as well as her</p> <p>19 then-supervisor.</p>
Robinson stepped down. Williams was her supervisor		
11	036:13 - 036:13	036:13 not just include securities but any contractor
Errata "security's"		
12	040:07 - 040:07	040:07 A. I'm a manager in facilities management
Errata insert "the"		
13	045:03 - 045:03	045:03 A. No one reviewed with HMMA -- HMMA reviewed
Errata insert "didn't"		
14	050:10 - 050:10	050:10 A. To she agreed to pull it back. And I
Errata change to "she to"		
15	055:07 - 055:07	055:07 don't know about that other.
Errata change that to "the"		
16	064:09 - 064:09	064:09 were in "agreeance" in it.
Errata change in to "with"		
17	079:17 - 079:17	079:17 Goldberg dreads are but -- and I don't know how
Errata Goldberg's		
18	082:13 - 082:13	082:13 A. They're a part --
Errata add "security"		
19	086:06 - 086:12	<p>086:06 Q. Who issues the badges?</p> <p>07 A. The receptionist, me, sometimes dispatch</p> <p>08 if we're short.</p> <p>09 Q. And who does the receptionist work for?</p> <p>10 A. The security company.</p> <p>11 Q. And who does dispatch work for?</p> <p>12 A. The security company.</p>
Dynamic Employees were maintaining hmma badge system		
20	089:07 - 089:07	089:07 know it's contract. And just to come up with a
Errata "contractor"		
21	090:04 - 090:04	090:04 A. At what --
Errata add "point"		
22	092:10 - 092:10	092:10 like, well down past the -- where I was allowing
Errata add "shoulder"		
23	093:20 - 093:20	093:20 building and don't go other places. They may take
Errata change don'tnto "do"		

24	096:05 - 096:05	096:05	that -- basically what Ms. Thomas said, that she
Errata correct Thomas to "Howell"			
25	097:03 - 097:03	097:03	Do you know whose idea -- like, how did
Errata ?			
26	106:19 - 106:19	106:19	Amco, I was not assigned an H- -- or Amco email
Errata add "E A"			
27	135:20 - 135:20	135:20	A. To differentiate the regular post office
Errata change office to "officers"			
28	141:13 - 141:13	141:13	up any outgoing that we may have in our box.
Errata insert "mail"			
29	144:05 - 144:05	144:05	back in -- when I was hired, that was a security
Errata insert "2004"			
30	149:14 - 149:14	149:14	A. It depends. So for preemployment home has
Errata change home to "HMMA"			